

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re

**ALLEGIANCE COAL USA LIMITED, et al.,**

Debtors.<sup>1</sup>

Chapter 11

Case No. 23-10234 (CTG)

(Jointly Administered)

**NOTICE OF APPEARANCE AND REQUEST FOR NOTICES**

**PLEASE TAKE NOTICE** that, pursuant to rules 2002 and 9019(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), the undersigned counsel hereby enters their appearance as counsel for Collins St Convertible Notes Pty Ltd, as trustee for The Collins St Convertible Notes Fund (“Collins”), in the above-captioned cases and requests that all notices and other papers filed or served in the above-captioned cases be served upon the following attorneys:

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<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor’s federal EIN, are as follows: Allegiance Coal USA Limited (1324); New Elk Coal Holdings LLC (1314); New Elk Coal Company LLC (0615); and Black Warrior Minerals, Inc. (6486). The Debtors’ mailing address for purposes of these chapter 11 cases is 12250 Highway 12, Weston, CO 81091.

**PLEASE TAKE FURTHER NOTICE** that, pursuant to section 1109(b) of the Bankruptcy Code, the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, orders and notices of any application, complaint or demand, motion, petition, pleading or request, and answering or reply papers filed in these cases, whether formal or informal, written or oral, and whether served, transmitted, or conveyed by mail, hand delivery, telephone, telegraph, telex, or otherwise filed or made with regard to the above-captioned cases and proceedings therein.

**PLEASE TAKE FURTHER NOTICE** that the aforementioned attorneys consent to service via electronic mail.

**PLEASE TAKE FURTHER NOTICE** that the request is also made that the attorneys identified herein be added to the official service list for notice of all contested matters, adversary proceedings, and other proceedings in the above-captioned chapter 11 cases.

**PLEASE TAKE FURTHER NOTICE** that this *Notice of Appearance and Request for Notices* shall not be deemed or construed to be a waiver of any of the rights of Collins, including, without limitation, to (i) have final orders in non-core matters entered only after *de novo* review by a higher court, (ii) trial by jury in any proceeding so triable in this case, or any case, controversy, or adversary proceeding related to this case, (iii) have the reference withdrawn in any matter subject to mandatory or discretionary withdrawal, or (iv) any other rights, claims, actions, defenses, setoffs, or recoupments to which Collins may be entitled in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

*[Signature Page Follows]*

Dated: March 28, 2023  
Wilmington, Delaware

Respectfully submitted,

/s/ Christopher M. Samis

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– and –

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*Counsel to Collins St Convertible Notes Pty Ltd, as Trustee for  
The Collins St Convertible Notes Fund*